

**ENTERED**

September 12, 2022

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Case No. 22-60043
	)	
FREE SPEECH SYSTEMS, LLC,	)	Chapter 11 (Subchapter V)
	)	
Debtor.	)	
	)	

**STIPULATION AND AGREED ORDER TO TERMINATE  
CLIENT SERVICES AGREEMENT BETWEEN  
THE DEBTOR AND ADP TOTALSOURCE, INC.**

WHEREAS, Free Speech Systems, LLC (the ‘Debtor’) and ADP TotalSource, Inc. (“TotalSource”) are parties to that certain Client Services Agreement (the “CSA”) dated October 20, 2016, pursuant to which TotalSource provides to the Debtor human resource services under an arrangement whereby the parties act as co-employers of the employees providing services to the Debtor; and

WHEREAS, Part 2, Section 10 of the CSA permits either party to terminate the CSA for any reason whatsoever on thirty (30) days’ written notice of one to the other; and

WHEREAS, TotalSource has communicated to the Debtor its desire to terminate the CSA; and

WHEREAS, the Debtor is willing to agree to a termination of the CSA on a date no sooner than September 30, 2022.

NOW, THEREFORE, it is stipulated by the parties and upon approval by the Bankruptcy Court, ordered that:

1. The CSA shall terminate effective at 11:59 pm on September 30, 2022.

2. In connection with such termination, TotalSource shall provide the Debtor with such information as it customarily provides other parties to CSAs upon termination.

3. TotalSource shall in the ordinary course provide the Debtor's employees covered by the CSA with W-2 forms for work performed up to the termination of the CSA.

Signed: September 12, 2022

  
\_\_\_\_\_  
Christopher Lopez  
United States Bankruptcy Judge

STIPULATED AND AGREED ON August 25, 2022 BY AND BETWEEN:

**ADP TOTALSOURCE, INC.**

**FREE SPEECH SYSTEMS, LLC**

/s/ Joseph S.U. Bodoff  
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